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March 10, 2025

## By ECF

Hon. Kenneth M. Karas, U.S.D.J United States District Court for Southern District of New York The Hon. Charles L. Brieant Jr.Federal Building and United States Courthouse 300 Quarropas Street White Plains, New York 10601-4105

Re: Hudson Neurosurgery, PLLC v. Archdioces of New York Docket No.: 7:24-cv-03489-KMK

Dear Judge Karas:

This firm represent Plaintiff, Hudson Neurosurgery, PLLC in the above-referenced action.

I write on behalf of the Plaintiff for the purposed of requesting that the Court permit the Plaintiff to file under seal, or redact, certain document relating to the Plaintiff's motion for summary judgment that contains the identify of the Patient. The Court granted a similar application on behalf of Defendant's motion for summary judgment.

Among the documents that the Plaintiff would propose to redact/seal would include the following:

- Defendant's Exhibits in support, which include medical records from the Plaintiff's files.
- The deposition transcripts of Dr. Choudhri and the Plaintiff's staff.
- Communication between plaintiff and United Healthcare.

We thank the court for its attention to this matter.

Granted, to the extent Plaintiff is proposing to redact confidential information and not seeking to seal entire documents that might contain some confidential information.

Respectfully submitted,

/s/ Richard Hochhauser

Richard Hochhauser

Partner

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